

## **EXHIBIT “G”**

**Certified** Copy

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

SUNIL KUMAR, Ph.D., PRAVEEN	) Case No.
SINHA, Ph.D.,	) 2:22-cv-07550
	) RGK-MAA
	)
Plaintiffs,	)
	)
v.	)
	)
DR. JOLENE KOESTER, in her	)
official capacity as	)
Chancellor of California	)
State University,	)
	)
	)
Defendants.	)
_____	)

VIDEOTAPED DEPOSITION OF  
PRAVEEN SINHA, Ph.D.  
Zoom Remote Location  
August 11, 2023  
TOTAL PAGES 177  
(PAGES 162 THROUGH 163 MARKED CONFIDENTIAL)

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

Praveen Sinha, PhD, 8/11/2023

1     **from 130 to 285. Is this all making sense?** 10:43

2           A. Yeah. I'm trying to find it. Give me a 10:43

3     second, please. 130 to 285; is that correct? 10:44

4           **Q. Yes. Open that document and then within** 10:44

5     **that go to 157.** 10:44

6           A. 157, okay. I'm there. 10:44

7           **Q. Okay. So, here on 157 you say, "Hi** 10:44

8     **Suhagji and Suniji, My revised drafted and an** 10:44

9     **academic article on Caste in China."** 10:45

10           **Does this help refresh your recollection** 10:45

11    **of what the article was?** 10:45

12           A. As I -- no. I know that there was an 10:45

13    article. I did not read it. And, the kind of 10:45

14    questions you're asking is totally not to my 10:45

15    knowledge. So, I forwarded that to the concerned 10:45

16    people. But I did not read it. 10:45

17           **Q. Why did you forward it to them?** 10:45

18           A. Suhag is dealing with these matters 10:45

19    relating to caste more actively. And, I'm a 10:45

20    faculty. I don't spend all my time looking into 10:45

21    such on this topics. 10:45

22           **Q. And, by that you mean Suhag Shukla, the** 10:45

23    **executive. And, she's the executive director of** 10:45

24    **the Hindu American Foundation?** 10:45

25           A. That's correct. 10:45

Praveen Sinha, PhD, 8/11/2023

1 Q. And, is she also one of your attorneys 10:45  
2 in this case? 10:45  
3 A. That is correct. 10:45  
4 Q. You also said -- while we're here we 10:45  
5 might as well finish this off. It says my revised 10:45  
6 draft is also attached. Actually, let's save that 10:46  
7 for after our break so we can look at the earlier 10:46  
8 documents. 10:46  
9 MR. MICHALOWSKI: Let's take 10 minutes 10:46  
10 and reconvene at 10:56, 10:57. We can go off the 10:46  
11 record. 10:46  
12 THE VIDEOGRAPHER: Off the record. Time 10:46  
13 is 10:46 a.m. 10:46  
14 (WHEREUPON, A BREAK WAS TAKEN AND THE 10:46  
15 PROCEEDINGS CONTINUED AS FOLLOWS:) 10:46  
16 THE VIDEOGRAPHER: This begins Media No. 10:46  
17 2. And the time on the record is 10:58 a.m. 10:58  
18 BY MR. MICHALOWSKI: 10:58  
19 Q. So, Professor, we're back on the record. 10:58  
20 I'm going to be asking you some 10:59  
21 questions about your caste background. The reason 10:59  
22 for this is because there are allegations in the 10:59  
23 complaint related to caste. And, that's why I 10:59  
24 need to ask you about it. So, do you believe that 10:59  
25 you have a caste? 10:59

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1           A. I can only speak for them through the 11:08  
2     data that I have seen in published studies. 11:08

3 Q. And, you've read published studies on 11:08  
4 caste blindness among Indian-Americans? 11:08

5           A.     A close correlation of that is caste                         11:08  
6     discrimination, which is more egregious. And,                         11:09  
7     I've seen studies on that.   11:09

8 Q. Are you referring to the Carnegie study? 11:09

9 A. Yeah. I've seen that study, yeah. 11:09

10 Q. Are you referring to any other studies? 11:09

11	A. That is the authoritative study that I	11:09
12	know of. There are other studies which are of	11:09
13	very limited credibility and scientifically	11:09
14	flawed.	11:09

15 Q. Are you aware of any other studies on 11:09  
16 this issue? 11:09

17 A. Yes, I am. 11:09

18 Q. What are they? 11:09

19           A. The study is by Equality Labs, which is 11:09  
20 what I mentioned earlier to be the most flawed 11:09  
21 study on this topic. 11:09

22 Q. So, you've now named two studies; one by 11:09  
23 Carnegie which you believe to be scientifically 11:09  
24 sound, one study by Equality Labs, which you do 11:09  
25 not believe to be scientifically sound. Do I have 11:09

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1     **that correct?** 11:10

2           A.     That is correct. There might be one 11:10  
3     more study which looks at that topic, but that is 11:10  
4     not in the US. 11:10

5           **Q.     So, your conclusion -- the Carnegie** 11:10  
6     **study clearly doesn't make any conclusions that** 11:10  
7     **all Indian-Americans are caste blind; fair?** 11:10

8           A.     It does not look at the issue of caste 11:10  
9     blindness. It looks at the issue of caste-based 11:10  
10    discrimination. 11:10

11          **Q.     It concludes that there is no caste-** 11:10  
12    **based discrimination?** 11:10

13          A.     It reaches a conclusion which is very 11:10  
14    close to having no caste-based discrimination in 11:10  
15    this country. 11:10

16          **Q.     That caste-based discrimination is rare?** 11:10

17          A.     Very rare. 11:10

18          **Q.     Is that your belief that caste-based** 11:10  
19    **discrimination in the United States is rare?** 11:10

20          A.     My personal experience I've not seen it. 11:10  
21    Based on that study there is a very, very 11:11  
22    minuscule small evidence of that. 11:11

23          **Q.     Does the Carnegie study address** 11:11  
24    **international students?** 11:11

25          A.     It looks at a highly diversified sample 11:11

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1 And the third is Mahabharat, M-A-H-A-B-H-A-R-A-T. 11:40  
2 THE COURT REPORTER: Thank you. 11:41  
3 BY MR. MICHALOWSKI: 11:41  
4 Q. Do you have any views related to caste 11:41  
5 that derive from your religious beliefs? 11:41  
6 MR. TWERSKY: Object to the form. 11:41  
7 THE WITNESS: Can I answer it? 11:41  
8 MR. TWERSKY: Yes, yes. Yes. 11:41  
9 A. I think I already outlined it what my 11:41  
10 belief about the caste varna system is. But if 11:41  
11 you want I can elaborate. 11:41  
12 BY MR. MICHALOWSKI: 11:41  
13 Q. Yes, I would like you to elaborate. 11:41  
14 A. According to Hindu belief system there 11:41  
15 are four varnas we determine what your occupation 11:41  
16 is and they can be interchanged. So, as a 11:41  
17 Professor or a lawyer like you are, you're a 11:41  
18 Brahman. As a trader you will be in the Vaisha 11:41  
19 category. As a blue collar worker you will be in 11:42  
20 the Shudra category. If you're in the military, 11:42  
21 firefighter you will be Kshatriya. That's what my 11:42  
22 belief about the varna system is. 11:42  
23 Q. And, do you have any -- 11:42  
24 A. Can I complete one more? 11:42  
25 Q. Of course, please. 11:42